

**BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN,  
ISLAMABAD**

*M/2/6/2018*

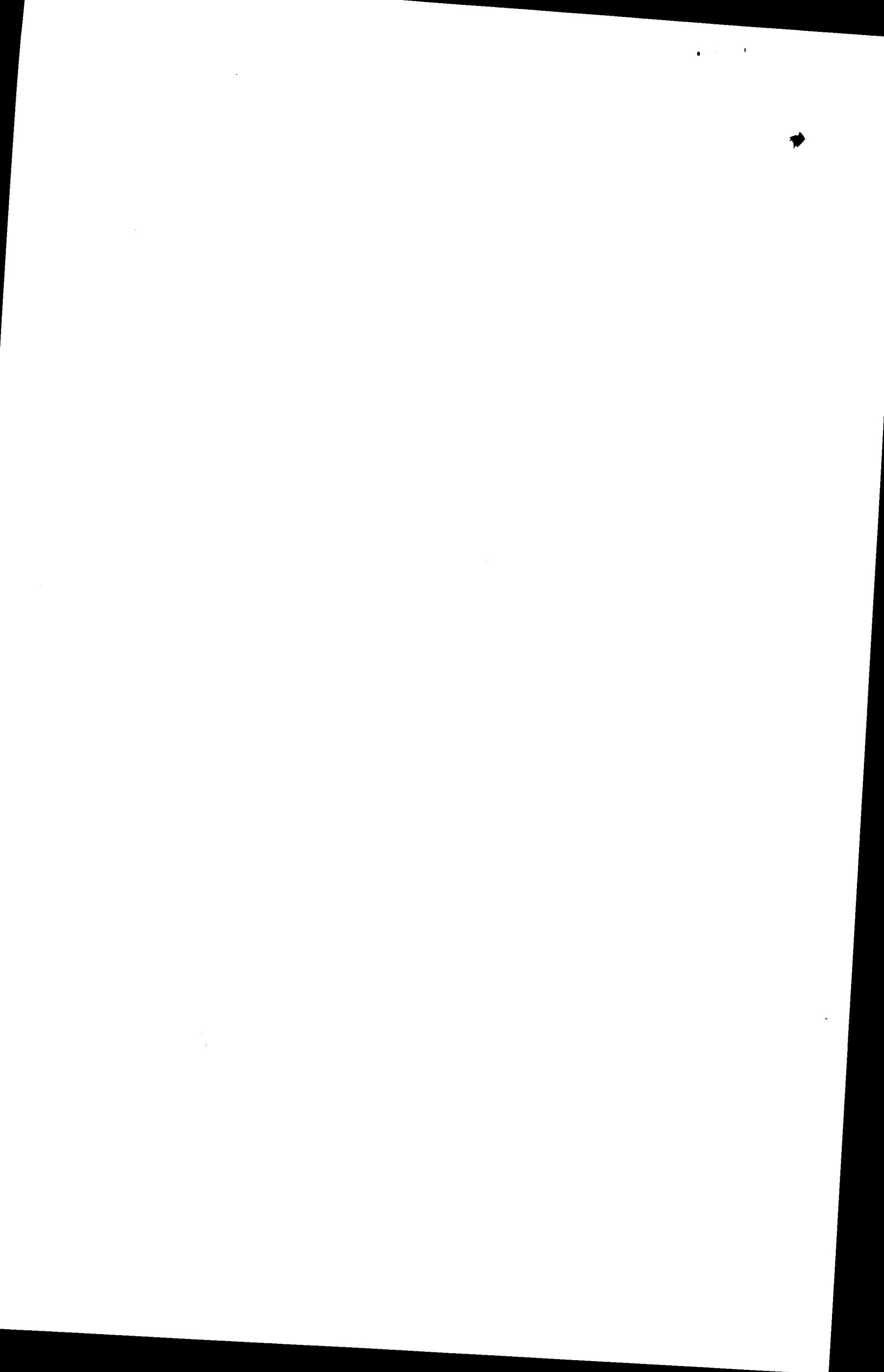
Representation No. \_\_\_\_\_/2018

**TAJJ MUHAMMAD** Son of Haji Khan Muhammad Resident of Dak Khana Aurara, Haveli  
Bari kay, Tehsil and District Kasur.

**SUBJECT:** REPRESENTATION Under Section 21(2) Of The Election Act 2017,  
Read With Under Rule 12 Of The Election Rules 2017 Challenging The  
Preliminary Proposal Pertaining to The Delimitation of National Assembly  
Constituencies No. 137, 138 In District Kasur.

Respected Sir,

1. That the instant Representation is being filed by Taji Muhammad, (Hereinafter referred to as the **Applicant**), registered voter of electoral area Aurara (اورارہ) which is included in the preliminary delimitation proposal of NA-137 Kasur-I, (year 2018) and the name of applicant is rightly mentioned in the serial no. 49 at block code no. 189030509 on electoral roll And is duly competent to file the instant representation under the law. Copy of vote certificate of the applicant issued by District Election Commissioner Kasur is Annexed here as **Annexure-A**.
2. That through this representation, the applicant seeks to challenge the preliminary proposal published by the Election Commission of Pakistan pertaining to the delimitation of the National Assembly constituencies' no. 137, 138 of District Kasur (Hereinafter referred to as the **Preliminary Proposal**).
3. That it is pertinent to mention here that District Kasur is now left with Four National Assembly constituencies numbering NA-137, NA-138, NA-139, and NA-140 which previously were Five in Numbers ( Numbering NA-138 to NA-142).
4. That the Applicant has no objection regarding the preliminary proposal of delimitation of constituencies number NA-139 and NA-140 of District Kasur but has serious objections regarding preliminary proposal of delimitation of constituencies number NA-137 and NA-138. List of Areas/Qanoongo Halqas/Patwar circles/Census blocks included in constituencies number NA-137 and NA-138 is Annexed here as **Annexure B**.



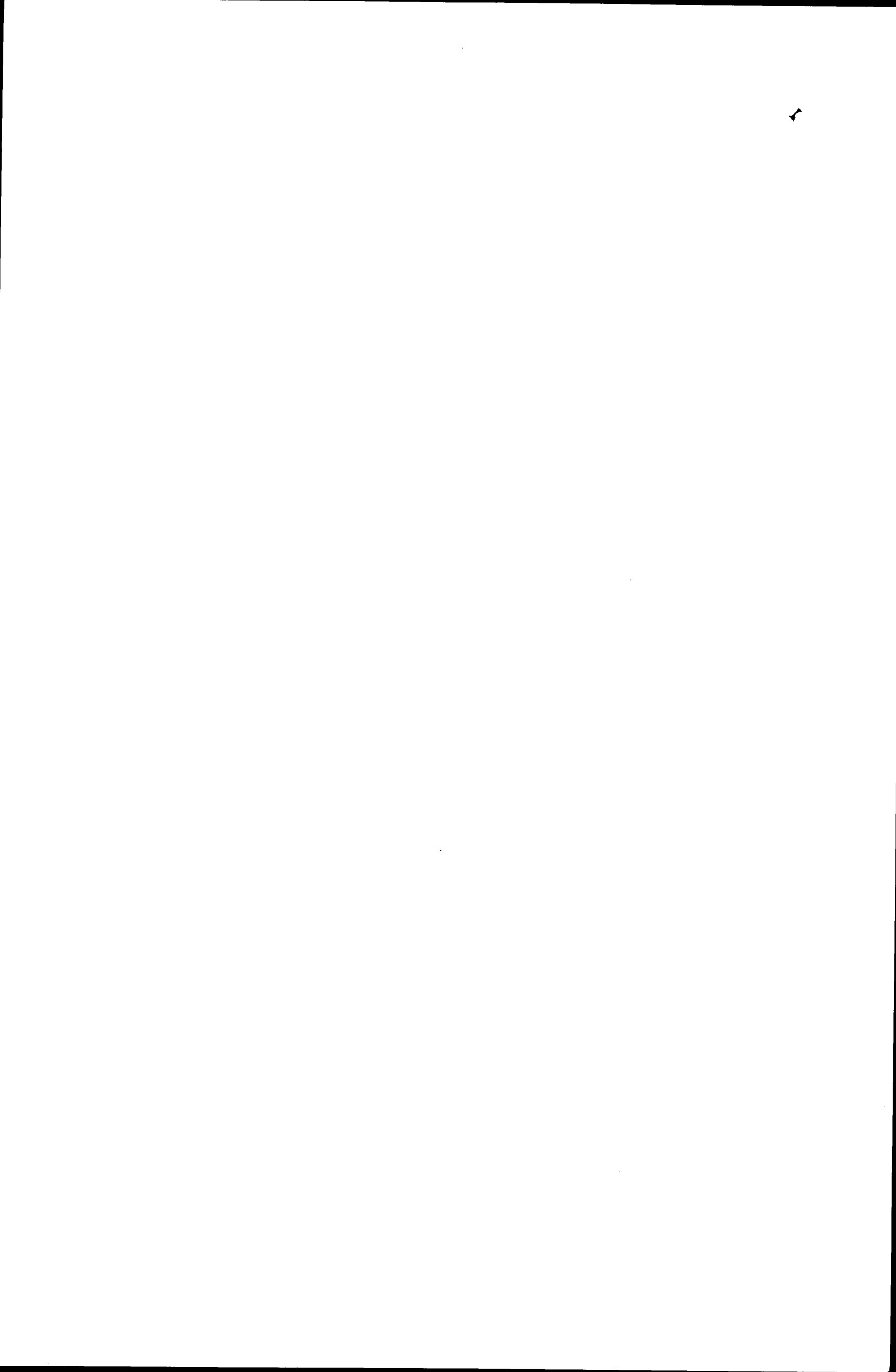
5. That the preliminary proposal of delimitation of constituencies number NA-137 and NA-138 is against the Law, Facts, Rules and Principles of delimitation laid down in The Delimitation Act 2017 and is liable to be rectified on the following grounds:

**GROUNDS**

- i. That the facilities of communication and public convenience should be kept in view while delimiting the constituencies but these two factors are completely ignored in the preliminary proposal of constituencies NA-138 and NA-137. In fact the areas included in the proposed delimitation of constituency NA-138 have no direct access with each other such as road links, railways network etc. which is against the rules/principles of delimitation.
- ii. That the constituencies should be geographically compact areas. The areas included in a constituency must be contiguous and their territorial unity should be ensured but in proposed delimitation, this instruction was not followed. It is pertinent to mention here that areas of city Kasur and Tehsil Khudian forms one compact block and directly connected with each other via road/railway network and areas of Mustafa Abad MC, Rajajang MC, and Tehsil Kot Radha Kishan forms one compact block and directly connected with each other via road/railway network.
- iii. That traditionally/Historically areas of Mustafa Abad MC, Rajajang MC, and Tehsil Kot Radha Kishan was in one constituency of National Assembly throughout the electoral history and this factor is ignored while preparing the preliminary proposal of constituencies NA-138 and NA-137.
- iv. That the cultural values, norms and rituals of the communities of different areas should be considered while delimitation of constituencies. However, this factor is ignored in preparing the preliminary proposal of constituencies NA-138 and NA-137. Actually, these areas are divided into two kinds of people; one called Hathar (ہٹھار) people and other Maja (ماجھا) people. The Hathar people are lived on one side of the area with the banks of river Sutluj while Maja people are on the other side. The preliminary proposal completely ignored this division and mix up the peoples of both side despite that fact they have not the same languages, not the same norms, not belongs the same culture etc.
- v. That the delimitation should be based upon same rules/principles. In preliminary proposal, the western areas of Kasur district i.e. Chunian, Ellahabad, Pattoki, Kanganpur and Phoolnagar are divided into two constituencies (NA-139 & NA-140) in horizontal manner. However, eastern areas i.e. Kasur city, Khudian, Mustafa bad, Raja Jang and Kot Radha Kishan are divided into two constituencies (NA-137 & NA-138) vertically without keeping in mind the ground realities of these areas.

Pr 22/10/2018

areas not directly connected with each other



6. That keeping in view the above mentioned circumstances/objections the applicant seeks to propose alternate boundaries with proportionate population for the constituency no NA-137 and NA-138 and the complete suggestions for both constituencies are annexed here as **Annexure-C & C1 and census** data of both constituencies is annexed as **Annexure-C2** here with kind perusal of the court and the map of alternate suggested boundaries of constituencies no NA-137 and NA-138 is annexed here as **Annexure-D** (hereinafter referred to as **proposed map**).

8/02/2018

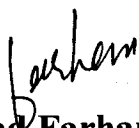
**PRAYER**

Under the circumstances above it is therefore most respectfully prayed that the alterations/modifications suggested by the applicant in the paragraph no. 6 of the instant representation may be accepted and the ips and boundaries of the constituencies no. NA-137 and NA-138. May be altered accordingly in the best interest and convenience of the people of District Kasur.

Any other relief which this Hon'ble Court deems fit and proper may also be awarded.

  
Applicant

Through

  
**Rana Muhammad Farhan Yousaf**  
Advocate High Court

Chamber: **Yousaf Law Associate**  
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